

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

L2 MOBILE TECHNOLOGIES LLC,

Plaintiff,

v.

ONEPLUS TECHNOLOGY (SHENZHEN)
CO., LTD.,

Defendant.

Civil Action No. 2:23-cv-00087

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE THE COMPLAINT UNDER SEAL

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff L2 Mobile Technologies LLC (“L2MT”) respectfully moves for entry of an Order authorizing Plaintiff to file its Complaint under seal, filed contemporaneously herewith. In support of this Motion, Plaintiff states as follows:

1. Public disclosure of the redacted portions of the Complaint will violate Plaintiff’s and Defendant’s established privacy interests because the redacted portions embody confidential and proprietary business communications and information subject to a Non-Disclosure Agreement entered into between Plaintiff and Defendant;
2. Plaintiff will comply with all applicable local rules and procedures regarding filing under seal through the Court’s CM/ECF system, including the requirement to file a redacted version within two days of filing the sealed documents.

WHEREFORE, Plaintiffs respectfully request entry of the attached order permitting the filing of its Complaint under seal.

Date: March 1, 2023

Respectfully submitted,

/s/ Timothy P. Maloney

Timothy P. Maloney (IL 6216483)

Joseph F. Marinelli (IL 6270210)

Alvaro Cure Dominguez (IL 6343312)

FITCH, EVEN, TABIN & FLANNERY LLP

120 South LaSalle Street, Suite 2100

Chicago, Illinois 60603

(312) 577-7000

tim@fitcheven.com

jmarinelli@fitcheven.com

acure@fitcheven.com

Counsel for Plaintiff